

Plaintiff's 30-page Motion to Dismiss raises a number of arguments for the dismissal of each of the Defendants' counterclaims. In order to respond adequately to the numerous arguments made in the motion to dismiss, Defendants need additional pages.

Counsel for Defendants has conferred with Plaintiff's counsel who have stated that they are not opposed to the relief requested in this motion. Thus, Defendants' request will not prejudice the Plaintiffs.

II. CONCLUSION

For these reasons, Defendant's request that the Court permit them to file a response to the Plaintiffs' Motion to Dismiss not to exceed 38 pages.

Dated: October 31, 2017

Respectfully submitted,

/s/ Karl Stern

Karl Stern

Texas Bar No. 19175665

Federal I.D. 04870

QUINN EMANUEL URQUHART &

SULLIVAN, LLP

711 Louisiana Street, Suite 500

Houston, Texas 77002-2721

Telephone: (713) 221-7000

Fax: (713) 221-7100

Email: karlstern@quinnemanuel.com

Kenneth B. Chaiken
State Bar No. 04057800
CHAIKEN & CHAIKEN, P.C.
Legacy Town Center III
5801 Tennyson Parkway
Plano, Texas 75024
Email: kchaiken@chaikenlaw.com
(214) 265-0250
(214) 265-1537 (fax)

William S. Rhea
State Bar No. 16807100
DuBOIS, BRYANT & CAMPBELL, LLP
303 Colorado Street, Suite 2300
Austin, TX 78701
Email: brhea@dbc.com
(512) 457-8000
(512) 457-8008 (fax)

*Attorneys for 2013 Travis Oak Creek GP, LLC, 2013
Travis Oak Creek Developer, Inc., Chula
Investments, Ltd. and Rene O. Campos*

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of October, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel who have consented to electronic service.

/s/ Karl Stern
Karl Stern